

## REMARKS

### 35 U.S.C. § 112, second paragraph

Claims 1-3 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants have cancelled claims 1-3 and added newly submitted claims 4-6 that obviate the basis of the rejection. Newly submitted claims 4-6 do not suggest a standard between the rim type and the location /pitch of the knurl arrangement and, therefore, do not fail to particularly point out and distinctly claim the invention.

### 35 U.S.C. § 102(b)

Claims 1-3 have been rejected under 35 U.S.C. § 102(b) as anticipated by McClevey (US 1,396,515). This rejection is respectfully traversed for the following reasons. The subject invention as claimed is directed to the problem of tire to rim slippage under torque and solves the problem through the provision that knurls of the tire are of complementary cross-section to the knurls of the rim and additional knurls are provided in the radially outer flange contacting surface with the knurls of the tire being capable of interlocking with the knurls of the rim in all three locations. Thus, the subject invention solves the slippage problem between the tire and the rim even if the tire is heavily loaded.

The McClevey reference, U.S. Patent 1,396,515, contrary to the Examiner's position, does not teach nor suggest each and every claimed feature of the invention as set forth in claims 4-6 and cannot, therefore, provide a proper basis for rejection of such claims under 35 U.S.C. 102(b). In fact, McClevey faces the problem of tire to rim slippage under torque but specifically confines interlocking knurls located in the bead base and the radially inner flange contacting surface. See Figs. 3-6 and page 1, lines 12-18 and page 2, lines 3-15 of McClevey. In particular, McClevey does not show additional knurls in the radially outer flange contacting surface and the knurls of the tire being capable of interlocking with knurls of the rim in all of three locations. McClevey merely provides axially and radially oriented knurls in the bead base area and in the radially inner flange contacting portion, respectively. No teaching or suggestion is found in McClevey toward the improved claimed structure of the present invention.

As McClevey fails to anticipate the invention as recited in claims 1-3, it is respectfully requested that this rejection be withdrawn.

Claims 1-3 have been rejected under 35 U.S.C. 102(b) as being anticipated by Ikeda (JP 03169727). This rejection is respectfully traversed for the following reasons. The Examiner has acknowledged that the rim of Ikeda does not even show a plurality of knurls. The tire claimed in claims 4-6 specifically recite a complementary cross-section to the knurls of a rim (Emphasis added). Moreover, the tire knurls are recited as being located in three specific locations, all of which being engageable by rim knurls. Simply put, Ikeda cannot serve as a basis for a 35 U.S.C. 102(b) of the claims because the Ikeda tire knurls are not taught to be complementary to anything, much less to rim knurls. Indeed, the absence of knurls in the Ikeda rim means the Ikeda tire knurls are not and cannot be complementary in cross-section to any element of the rim. The Examiner's argument that the claims are to a tire rather than a tire and a rim are not in issue. It is to a tire having a complementary knurl cross-section that the claims are directed; structure not found in Ikeda. The claims, contrary to the Examiner's stated interpretation, do not "only require[s] that the tire is formed with a plurality of knurls". Rather, the knurls must be formed having a complementary cross-sectional relationship with knurls on a rim surface. Clearly, Ikeda fails to teach such a complementary cross-sectional structure and relationship. Finally, the Examiner's statement that the Ikeda tire is capable of forming an interlocking assembly if it were mounted on a rim having a complimentary arrangement of knurls begs the question and is totally the product of inappropriate hindsight. The fact is that Ikeda teaches a rim that lacks a complimentary arrangement of any knurls, and therefore, teaches away from the subject invention, is strong evidence that the invention is patentably distinct.

As Ikeda fails to anticipate the invention as recited in claims 1-3, it is respectfully requested that this rejection be withdrawn

### 35 U.S.C. § 103

Claim 2 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over McClevey and further in view of Ikeda, Udall (US 4,209,051) and Hino (JP 05139106). This rejection is respectfully traversed for the following reasons. The deficiency in the primary reference in showing a knurl of triangular configuration noted by the Examiner cannot be resolved through a combination of McClevey with the three references cited when none of the

references teach or suggest respective modification and combination in the manner suggested. Moreover, claim 2, now of the same scope as claim 5, is dependent upon claim 4 which is clearly distinguished over the collective art for the reasons set forth above. None of the references teach complementary tire knurls in three location that are interlockable at all three locations with complementary rim knurls. It is, therefore, logical that no combination of the references provide a proper basis for reconstructing their respective teachings to the contrary toward the claimed tire structure. The inclusion of a triangular shape with the three locations of the interlocking knurls specified is a combination not found in the cited art. Applicants accordingly disagree with the sufficiency of the combined four references in supporting a conclusion of obviousness.

In light of this amendment, all of the claims now pending in the subject patent application are allowable. Thus, the Examiner is respectfully requested to allow all pending claims.

Respectfully submitted,



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